

EX PARTE OR LATE FILED

March 24, 1999

Mr. Ron Netro
Senior Engineer, Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20024

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Re: Ex Parte Presentation
CC Docket No. 94-102

Dear Mr. Netro:

During our meeting on Thursday, February 25, 1999, you asked us to provide an explanation of the symbols which appear in the Lechuga call detail record. The attached item, which is entitled "Call Detail Record Symbols," is submitted in response to that request.

We would also like to take this opportunity to comment on CTIA's March 12, 1999, notice of the *ex parte* conference call with you and Martin Liebman concerning Automatic A/B Roaming when used in conjunction with Intelligent Retry ("IR"). The Commission has found that the public interest requires access to 911 over the wireless system "that will provide the **quickest and most reliable and accurate response.**"¹ The record in this proceeding is replete with statements by all parties that amount of time necessary to connect a 911 call is critical.² Indeed CTIA has criticized Strongest Signal for adding 50 milliseconds to the call processing time. CTIA now has the audacity to argue that adding 65 seconds using Automatic A/B Roaming/IR is acceptable -- it is clearly not! CTIA attempts to overcome this fatal deficiency in its Automatic A/B Roaming/IR proposal by saying that "the overwhelming majority" of calls will be connected in less than 10 seconds. In the "minority" are: 4,000 emergency calls that will not be connected *each day*, more than 5,000 emergency calls that will be dropped *each day* and more than 15,000 calls that will be assigned to a poor channel *each day*. These are very significant numbers and

¹ Report and Order and Further Notice of Proposed Rulemaking, ¶ 145, CC Docket 94-102 (June 12, 1996). (Emphasis added).

² The record is very clear that 12 seconds is the maximum acceptable time to connect a 911 call.

cannot be discounted by simply saying that they are a "minority" of calls. As the record shows, more than 85% of the time these calls will be quickly connected by Strongest Signal over reliable channels of communication.

CTIA also says that it stressed in its conversation with you that Automatic A/B Roaming "provides the caller with the highest probability of call completion *with the 'Preferred Carrier.'*" (Emphasis added). This *does not mean* that Automatic A/B Roaming has "the highest probability of call completion" -- it does not -- not by a long shot. CTIA tells you that the user is better off in an emergency on the preferred side, even with a poor channel or unusable channel³, because the preferred carrier will provide enhanced 911 features and services. This argument ignores the fact that *all carriers* must provide enhanced 911 features *to all users of their systems* pursuant to the Commission's orders.⁴

Please let me know if you require additional information.

Sincerely,


Carl Hilliard

cc: Wireless Telecommunications Bureau
Mr. John Cimko, Chief, Policy Division
Mr. Marty Liebman, Engineer, Policy Division

Office of Engineering and Technology
Mr. Jim Schlichting, Deputy Chief
Mr. Julius Knapp, Chief, Policy & Rules Division
Ms. Karen Rackley, Chief, Technical Rules Branch, Policy and Rules Division

Office of the Secretary
Ms. Magalie Roman Salas, Secretary

³ Be assured that Marcia Spielholz, the Lechuga family and others similarly situated in the past and in the future are not "better off" with an unusable channel.

⁴ Call back is a non-issue because the Alliance provided a solution for call back to all callers to 911. The argument that some carriers might deploy enhanced 911 features before the deadline has fallen by the wayside with the revelation that less than 5% of carriers have deployed Phase I features.

CALL DETAIL RECORD SYMBOLS

STRUCTURE CODE: TYPE OF CELLULAR SYSTEM (1339 = ANALOG SYSTEM)
CALL TYPE: SELF EXPLANATORY
REC: RECORD NUMBER (SEQUENTIAL FROM 1 FOR PERIOD REQUESTED)
TO DN: CALLED NUMBER (NUMBER DIALED BY CALLER)
CIDGT: CARRIER INTERFACE DIGITS (STEERING TO DESIRED INTEREXCHANGE CARRIER)
HOF: HANDOFF COUNT (NUMBER OF CALL HANDOFFS THAT OCCURRED)
SID: SYSTEM IDENTITY OF CELLULAR SYSTEM THAT ACCEPTED CALL ORIGINATION
DCS: DIGITAL CONTROL SYSTEM IDENTITY (WHICH PART OF THIS MTSO)
NIPTG: NETWORK INTERFACE PLAN TRUNK GROUP (ID OF PHONE LINE GROUP)
NIPTM: NETWORK INTERFACE PLAN TRUNK MEMBER (ID OF MEMBER OF TRUNK GROUP)
ICS: INITIAL CELL SITE (CELL SITE IDENTITY THAT ACCEPTED CALL)
IRDO: INITIAL RADIO (VOICE CHANNEL ASSIGNED BY THE CELL SITE)
PSCM: PARTIAL STATION CLASS MARK (CAN MOBILE HANDLE EAMPS CHANNELS)
SCM: STATION CLASS MARK
LCS: LAST CELL SITE (CELL SITE IDENTITY WHERE CALL TERMINATED)
LRDO: LAST RADIO (VOICE CHANNEL AT END OF CALL)
RCFI: RADIO CALL FAILURE INDICATOR "NO FAILURE OCCURRED" MEANS THE MOBILE UNIT PRESSED END OR THE LAND LINE HUNG UP. "TIMED OUT MOBILE UNIT RELEASE" MEANS THAT THE CELL SITE *LOST SAT TIMER* EXPIRED AND THE MTSO ISSUED A RELEASE ORDER TO THE MOBILE UNIT TO TERMINATE THE CALL.
VC: VOICE CHANNEL NUMBER IF DIFFERENT FROM THE RADIO PLAN
 D: DATE VOICE CHANNEL WAS FIRST USED FOR THIS CALL
 T: TIME THAT THE CALL STARTED ON THAT DATE
 E: ELAPSED TIME OF THE VOICE CHANNEL OCCUPANCY (RADIO CALL LENGTH)
LAND: LANDLINE TRUNK NUMBER IF DIFFERENT FROM NETWORK INTERFACE PLAN
 D: DATE LAND LINE WAS FIRST USED FOR THIS CALL (IF ZERO, CALL NEVER DIALED)
 T: TIME THAT THE CALL STARTED ON THAT DATE (IF ZERO, CALL NEVER DIALED)
 E: ELAPSED TIME OF LANDLINE TRUNK OCCUPANCY (NETWORK CALL LENGTH)
3WAY: 3-WAY CALL INDICATOR
 E: ELAPSED TIME OF THREE-WAY CALL
LSA: LIMITED SERVICE AREA NUMBER (NEIGHBORHOOD CELLULAR) CALL
 E: ELAPSED TIME OF LSA CALL
BTYP:
RSIND: ROUTING SERVICE INDICATOR
DCSDGT: DCS DIGITS (TRANSLATED DIALED DIGITS IF DIFFERENT)
SRTG: SPECIAL ROUTING TRUNK GROUP
SRTM: SPECIAL ROUTING TRUNK MEMBER
ANSSTAT: ANSWER STATUS (WAS CALL ANSWERED)
CIOPER: CARRIER INTERFACE OPERATOR IDENTIFIER (WHICH OPERATOR INVOLVED)
DIAL: HOW CALL WILL BE ROUTED
LSAIND: LIMITED SERVICE AREA INDICATOR
MRSTAT: MESSAGE RECORDER STATUS (WAS A RECORDED ANNOUNCEMENT USED)